

Exhibit “A”

1
2
3 U.S. ENVIRONMENTAL PROTECTION AGENCY
4

5 * * *

6 IN RE:
7

8 BOARHEAD FARMS SUPERFUND SITE
9

10 * * *

11 Administrative deposition of MARIAN CHANCE, taken
12 pursuant to notice on Wednesday, May 14, 1997, was held
13 in the LANDMARK LODGE, I-95 and N.J. Turnpike, Penns
14 Grove, New Jersey ^ zip, commencing at 10:00 a.m.,
15 before Stacy M. Uptegraph, Certified Shorthand Reporter
16 and Notary Public, there being present:
17

18 * * *

19 ACCURATE COURT REPORTING SERVICES, INC.
20 555 Blackwood-Clementon Road
21 Post Office Box 9500
22 Clementon, New Jersey 08021
23 (609) 435-7300 FAX (609) 435-4599
24 -and-
25 20 South Tennessee Avenue, Suite 200
Atlantic City, New Jersey 08401
(609) 340-0165 FAX (609) 340-0171

1 APPEARANCES:

2

U.S. ENVIRONMENTAL PROTECTION AGENCY

3 BY: SARAH P. KEATING, ESQ.

Region III, 3RC33

4 841 Chestnut Building

Philadelphia, PA 19107

5 Senior Assistant Regional Counsel for U.S.
Environmental Protection Agency

6

7 A L S O P R E S E N T:

8 Bevin Esposito

U.S. Environmental Protection Agency

9 Paul J. Neale, Jr.

U.S. Environmental Protection Agency

10

11

INDEX

12

13 WITNESS:

PAGE

14

MARIAN CHANCE

15

BY: Ms. Keating

16

* * *

17

18

19

20

21

22

23

24

25

1 UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
2 REGION III
3 841 CHESTNUT BUILDING
4 PHILADELPHIA, PA 19107-4431

CONFIDENTIAL

5 IN REGARD TO THE MATTER OF:

6 BOARHEAD FARMS SUPERFUND SITE,
7 BUCKS COUNTY, PENNSYLVANIA

COPY

8
9
10 Wednesday, June 4, 1997

11 Oral sworn deposition of JOHN BARSUM, held
12 at the National Hotel, 31 Race Street, Frenchtown,
13 New Jersey 08825 before Heather L. Ashton, Certified
14 Shorthand Reporter and Notary Public of the State of
15 New Jersey, held on the above date, commencing at
16 11:30 A.M., there being present:

17 A P P E A R A N C E S B Y:

18 U.S. ENVIRONMENTAL PROTECTION AGENCY
19 BY: SARAH KEATING, ESQUIRE
20 841 Chestnut Building
21 Philadelphia, PA 19107
22 Attorneys for the Government

23 ACCURATE COURT REPORTING SERVICES, INC.
24 555 Blackwood-Clementon Road
25 Post Office Box 9500
Clementon, New Jersey 08021
(609) 435-7300 FAX (609) 435-4599
-and-
20 South Tennessee Avenue, Suite 200
Atlantic City, New Jersey 08401
(609) 340-0165 FAX (609) 340-0171

ACCURATE COURT REPORTING SERVICES, INC.

1 A P P E A R A N C E S C O N T I N U E D :

2 U.S. ENVIRONMENTAL PROTECTION AGENCY
3 BY: BEVIN ESPOSITO
4 841 Chestnut Building
Philadelphia, PA 19107
Attorneys for the Government

5 U.S. ENVIRONMENTAL PROTECTION AGENCY
6 BY: PAUL NEALE
7 841 Chestnut Building
Philadelphia, PA 19107
Attorneys for the Government

8
9 U.S. ENVIRONMENTAL PROTECTION AGENCY
10 BY: JOAN MARTIN-BANKS
11 841 Chestnut Building
Philadelphia, PA 19107
Attorneys for the Government

12 U.S. ENVIRONMENTAL PROTECTION AGENCY
13 BY: ELIZABETH APPEL
14 841 Chestnut Building
Philadelphia, PA 19107
Attorneys for the Government

15

16

17

18

19

20

21

22

23

24

25

1 UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
2 REGION III
3 841 CHESTNUT BUILDING
4 PHILADELPHIA, PA 19107-4431

CONFIDENTIAL

5 IN REGARD TO THE MATTER OF:

6 BOARHEAD FARMS SUPERFUND SITE,
7 BUCKS COUNTY, PENNSYLVANIA

COPY

8
9
10 Thursday, June 5, 1997

11 Oral sworn deposition of JOHN BARSUM, held
12 at the National Hotel, 31 Race Street, Frenchtown,
13 New Jersey 08825 before Heather L. Ashton, Certified
14 Shorthand Reporter and Notary Public of the State of
15 New Jersey, held on the above date, commencing at
16 10:30 A.M., there being present:

17 A P P E A R A N C E S B Y:

18 U.S. ENVIRONMENTAL PROTECTION AGENCY
19 BY: SARAH KEATING, ESQUIRE
20 841 Chestnut Building
21 Philadelphia, PA 19107
22 Attorneys for the Government

23 ACCURATE COURT REPORTING SERVICES, INC.
24 555 Blackwood-Clementon Road
25 Post Office Box 9500
Clementon, New Jersey 08021
(609) 435-7300 FAX (609) 435-4599
-and-
20 South Tennessee Avenue, Suite 200
Atlantic City, New Jersey 08401
(609) 340-0165 FAX (609) 340-0171

ACCURATE COURT REPORTING SERVICES, INC.

1 A P P E A R A N C E S C O N T I N U E D :

2 U.S. ENVIRONMENTAL PROTECTION AGENCY
3 BY: BEVIN ESPOSITO
4 841 Chestnut Building
Philadelphia, PA 19107
Attorneys for the Government

5 U.S. ENVIRONMENTAL PROTECTION AGENCY
6 BY: PAUL NEALE
7 841 Chestnut Building
Philadelphia, PA 19107
Attorneys for the Government

8 U.S. ENVIRONMENTAL PROTECTION AGENCY
9 BY: JOAN MARTIN-BANKS
10 841 Chestnut Building
Philadelphia, PA 19107
Attorneys for the Government

11 U.S. ENVIRONMENTAL PROTECTION AGENCY
12 BY: ELIZABETH APPEL
13 841 Chestnut Building
Philadelphia, PA 19107
Attorneys for the Government

14

15

16

17

18

19

20

21

22

23

24

25

- - -
IN RE: BOARHEAD FARMS NPL :
SUPERFUND SITE :

ORIGINAL
(Red)

ORIGINAL

- - -
Thursday, March 13, 1997
Commencing at 10:55 a.m.

- - -
Best Western Motor Inn
1446 West Broad Street
Quakertown, Pennsylvania 18951

- - -
NOTE: THIS TRANSCRIPT IS THE WORK PRODUCT OF ROBERT W.
HARLEY, REGISTERED PROFESSIONAL REPORTER. COPIES ARE
AVAILABLE ONLY THROUGH ROBERT W. HARLEY.

Robert W. Harley Reporting Services
Suite 700
One Montgomery Plaza
Norristown, Pa. 19401
(610) 270-0811

ORIGINAL
(R-3)

COUNSEL APPEARED AS FOLLOWS:

SARAH P. KEATING, ESQUIRE
Senior Assistant Regional Counsel
841 Chestnut Building
Phila., Pa. 19107-4431

for U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION III

ALSO PRESENT:

BEVIN HARDY, PARALEGAL SPECIALIST
PAUL J. NEALE, JR., PARALEGAL SPECIALIST
JOAN E. MARTIN-BANKS, CIVIL INVESTIGATOR
Region III
841 Chestnut Building
Phila., Pa. 19107

Witness: BRUCE J. DeREWAL

EXHIBITS

U.S. EPA Exhibits

No.	Description	Mrkd
1	Administrative subpoena	6
2	Boarhead Farms site map	8
3	Photograph	11
4	Photograph	12
5	Boarhead Farms site map (Pit W)	43
6	Photograph	43
7	Photograph	43
8	Jonas Trucking Company operating record	45
9	Jonas Trucking Company operating record	46

- - -
IN RE: BOARHEAD FARMS NPL :
SUPERFUND SITE :

- - -
Wednesday, February 26, 1997
Commencing at 9:55 a.m.

- - -
Holiday Inn
Suite 302
Ft. Washington, Pennsylvania 19034

- - -
NOTE: THIS TRANSCRIPT IS THE WORK PRODUCT OF ROBERT W.
HARLEY, REGISTERED PROFESSIONAL REPORTER. COPIES ARE
AVAILABLE ONLY THROUGH ROBERT W. HARLEY.

Robert W. Harley Reporting Services
Suite 700
One Montgomery Plaza
Norristown, Pa. 19401
(610) 270-0811

COUNSEL APPEARED AS FOLLOWS:

SARAH P. KEATING, ESQUIRE
Senior Assistant Regional Counsel
841 Chestnut Building
Phila., Pa. 19107-4431

for U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION III

ALSO PRESENT:

BEVIN HARDY, PARALEGAL SPECIALIST
PAUL J. NEALE, JR., PARALEGAL SPECIALIST
JOAN E. MARTIN-BANKS, CIVIL INVESTIGATOR
Region III
841 Chestnut Building
Phila., Pa. 19107

Witness: MANFRED F. DeREWAL, JR.

EXHIBITS

U.S. EPA Exhibits

<i>No.</i>	<i>Description</i>	<i>Mrkd</i>
1	Administrative subpoena	5
2	Boarhead Farms site map	10
3	Photograph	11
4	Photograph	11
5	Boarhead Farms site map (Pit W)	41
6	Photograph	41
7	Photograph	41
8	Jonas Trucking Company operating record	46
9	Jonas Trucking Company operating record	47

1 BEFORE THE

2 UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

3 In the Matter of:

4 BOARHEAD FARMS SUPERFUND SITE:)
5 REVERE CHEMICAL SUPERFUND SITE:) Caes No. 000008
AND FRENCHTOWN SUPERFUND SITE.)

6

7 Deposition of:

8 MANFRED DEREWAL

9 a witness of lawful age, taken on behalf of the U. S.

10 Environmental Protection Agency, pursuant to notice,

11 in the offices of the United States Marshall, Room 2113,

12 601 Market Street, Philadelphia, Pennsylvania, 19106, on

13 Wednesday, March 15, 1989, at 10:25 a.m., before Barbara

14 A. Burke, Notary Public, when where present:

15

16 APPEARANCES:

17

On behalf of the Environmental Protection Agency:

19 WAYNE WALTER, ESQ.

BRIAN M. NISHITANI, ESQ.

20 Environmental Protection Agency

Office of Regional Counsel

21 Region III

841 Chestnut Street

22 Philadelphia, Pa. 19107

23

24

25

2

1 ROBERT G. CARR, ESQ.
Environmental Protection, Agency
2 Region II, Office of Regional Counsel
26 Federal Plaza
3 New York, New York 10278
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

1 BEFORE THE
2 UNITED STATES ENVIRONMENTAL PROTECTION
3 In the Matter of:)
4 BOARHEAD FARMS SUPERFUND SITE:)
REVERE CHEMICAL SUPERFUND SITE:) C
5 AND FRENCHTOWN SUPERFUND SITE.)
6)

7 Deposition of:

8 MANFRED DEREWAL

9 a witness of lawful age, taken on behalf of the U. S.
10 Environmental Protection Agency, pursuant to notice,
11 in the offices of the United States Marshall, Room 2113,
12 601 Market Street, Philadelphia, Pennsylvania, 19106, on
13 Friday, March 17, 1989, at 10:00 a.m., before Carl
14 Dillich, Notary Public, when where present:

15

16 APPEARANCES:

17

18 On behalf of the Environmental Protection Agency:

19 WAYNE WALTERS, ESQ.

BRIAN M. NISHITANI, ESQ.

20 Environmental Protection Agency

Office of Regional Counsel

21 Region III

841 Chestnut Street

22 Philadelphia, Pa. 19107

23

24

25

1	I N D E X	
2	WITNESS:	EXAMINATION
3	MANFRED DEREWAL	179
4	EXHIBITS:	IDENTIFIED
5	ENVIRONMENTAL PROTECTION AGENCY'S:	
6	2-1	181
7	2-2	192
8	2-3, 2-4	205
9	2-5	209
10	2-6	231
11	2-7	249
12	2-8	264
13	2-9	282
14	2-10	294
15	2-11	302
16	2-12	306
17	2-13	308
17	2-14	309
18	2-15	323
19	2-16	331
20	2-17	341
21		
22		
23		
24		
25		

MANFRED TATARA DeREWAL, VOL. I 12-10-96

1

1
2
3
4
5 IN RE: BOARHEAD FARMS SUPERFUND SITE
6
7
8
9
10

11 SWORN STATEMENT OF
12 MANFRED TATARA DeREWAL
13 VOLUME I
14
15
16

17 On the 10th and 11th days of December,
18 1996, at 10:17 a.m. and 10:35 a.m., respectively, the
19 sworn statement of the above-named witness was taken
20 at the instance of the United States Enviornmental
21 Protection Agency before Greg B. Hunt, Certified
22 Shorthand Reporter in and for the State of Texas, at
23 the Bureau of Prisons Federal Medical Center, 3150
24 Horton Road, in the City of Fort Worth, County of
25 Tarrant, State of Texas.

COPY

A P P E A R A N C E S

U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION III
841 Chestnut Building
Philadelphia, PA 19107-4431
BY: MS. SARAH P. KEATING

Senior Assistant Regional Counsel

U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION III
841 Chestnut Building
Philadelphia, PA 19107-4431
BY: MS. BEVIN HARDY

Paralegal Specialist

U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION III
841 Chestnut Building
Philadelphia, PA 19107-4431
BY: MR. PAUL J. NEALE, JR.

Paralegal Specialist

I N D E X

WITNESS

MANFRED TATARA DeREWAL

EXAMINATION

BY: MS. KEATING

PAGE
4

EXHIBITS

PAGE

Exhibit No. 1	8
Exhibit No. 2	10
Exhibit No. 3	12
Exhibit No. 4	19
Exhibit No. 5	68
Exhibit No. 6	68
Exhibit No. 7	69
Exhibit No. 8	76
Exhibit No. 9	80
Exhibit No. 10	83
Exhibit No. 11	86
Exhibit No. 12	93
Exhibit No. 13	95
Exhibit No. 14	98
Exhibit No. 15	100
Exhibit No. 16	101
Exhibit No. 17	102
Exhibit No. 18	103
Exhibit No. 19	105

1
2
3
4
5 IN RE: BOARHEAD FARMS SUPERFUND SITE
6
7
8
9
10

11 SWORN STATEMENT OF
12 MANFRED TATARA DeREWAL
13 VOLUME II
14
15
16

17 On the 10th and 11th days of December,
18 1996, at 10:17 a.m. and 10:35 a.m., respectively, the
19 sworn statement of the above-named witness was taken
20 at the instance of the United States Environmental
21 Protection Agency before Greg B. Hunt, Certified
22 Shorthand Reporter in and for the State of Texas, at
23 the Bureau of Prisons Federal Medical Center, 3150
24 Horton Road, in the City of Fort Worth, County of
25 Tarrant, State of Texas.

COPY

A P P E A R A N C E S

U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION III
841 Chestnut Building
Philadelphia, PA 19107-4431
BY: MS. SARAH P. KEATING

Senior Assistant Regional Counsel

U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION III
841 Chestnut Building
Philadelphia, PA 19107-4431
BY: MS. BEVIN HARDY

Paralegal Specialist

U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION III
841 Chestnut Building
Philadelphia, PA 19107-4431
BY: MR. PAUL J. NEALE, JR.

Paralegal Specialist

I N D E X

WITNESS

MANFRED TATARA DeREWAL

EXAMINATION

PAGE

BY: MS. KEATING

152, 235, 253

EXAMINATION

BY: MR. HARDY

225, 251

EXHIBITS

PAGE

Exhibit No. 28 153

Exhibit No. 29 156

Exhibit No. 30 161

Exhibit No. 31 167

Exhibit No. 32 176

Exhibit No. 33 236

Exhibit No. 34 239

Exhibit No. 35 240

Exhibit No. 36 245

Exhibit No. 37 246

Exhibit No. 38 248

Exhibit No. 39 248

Exhibit No. 40 253

Exhibit No. 41 262

Exhibit No. 42 262

STATE OF NEW JERSEY
OFFICE OF REGULATORY SERVICES
DEPARTMENT OF ENVIRONMENTAL
PROTECTION

x-----x
:
IN THE MATTER OF :
:
MARVIN JONAS :
:
x-----x

APRIL 14, 1986
10:00 a.m.
OFFICE OF KEVIN F. WALL, ESQ.
407 White Horse Pike
Oaklyn, New Jersey 08107

A P P E A R A N C E S:

JOHN A. MacDONALD, ESQ.
Attorney for New Jersey
Department of
Environmental Protection

OFFICE OF REGULATORY
SERVICES DEPARTMENT OF
ENVIRONMENTAL PROTECTION
Trenton, New Jersey

DAVID B. GRAHAM, ESQ.
Attorneys for Township
of Gloucester.

FREEDMAN, LEVY, KROLL &
SIMONDS, ESQ.
1050 Connecticut Ave., N.W.
Washington, D.C.

KEVIN F. WALL, ESQ.
Attorney for Marvin Jonas.

407 White Horse Pike
Oaklyn, New Jersey

ALSO PRESENT:

GEORGE SMAJDA
Representative for Department
of Environmental Protection.

REED JENSEN
Investigator for David Graham,
Esq.

ALBANESE, WASIK & ASSOCIATES

CERTIFIED SHORTHAND REPORTERS

2224 ROUTE 37, EAST

TOMS RIVER, N.J. 08753

TELEPHONE (201) 270-6300

968

I N D E XWitnessDirect Cross Redirect Recross

MARVIN JONAS

By Mr. MacDonald 3 120

By Mr. Graham 108 132

E X H I B I T S

<u>No.</u>	<u>Description</u>	<u>ID</u>
S-1	List of Disposal Sites	7
S-2	List	48
S-3	Application for Certification	55
S-4	Document Entitled Tariff for Solid Waste Collection	56
S-5	List	79

STATE OF NEW JERSEY
DEPARTMENT OF ENVIRONMENTAL PROTECTION

IN THE MATTER OF:

MARVIN JONAS

INVESTIGATION

Testimony of Marvin Jonas taken
stenographically in the above-entitled matter before
Linda L. Psyllos, a Certified Shorthand Reporter and
Notary Public of the State of New Jersey, at the law
offices of Kevin Wall, Esq., 407 Whitehorse Pike,
Oaklyn, N.J., April 15, 1986 commencing at 11:00 a.m.

A P P E A R A N C E S:

JOHN A. MAC DONALD, ESQ.
Office of Regulatory Service
New Jersey DEP

KEVIN WALL, ESQ.
Attorney for Marvin Jonas

DAVID B. GRAHM, ESQ.
Attorney for the Township of Gloucester

ALBANESE & ASSOCIATES REPORTING SERVICE
2224 Rt. 37 E., Toms River, N.J.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

I N D E X

<u>WITNESS</u>	<u>PAGE</u>
MARVIN JONAS Direct Examination by Mr. MacDonald	3

E X H I B I T S

<u>ID</u>	<u>DESCRIPTION</u>	<u>PAGE</u>
S-6	Documents	7

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - GLOUCESTER COUNTY
DOCKET NO. C-3902-85

DOUGLAS ZEE, INDIVIDUALLY,
PATRICIA ZEE, INDIVIDUALLY,
WILMER ZEE, AND ZEE ORCHARDS,
INC..

PLAINTIFFS,

ORAL DEPOSITION OF:

VS.

MARVIN JONAS

NICK LIPARI, D/B/A LIPARI
LANDFILL, ROHM & HAAS COMPANY,
ALMO, INC., OWENS-ILLINOIS,
INC., AND MARVIN JONAS,
D/B/A JONAS WASTE REMOVAL.

DEFENDANTS.

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

CIVIL ACTION NO.
85-4386

VS.

ROHM & HAAS COMPANY

* * * * *

THURSDAY, APRIL 17, 1986

* * * * *

TRANSCRIPT IN THE ABOVE MATTER TAKEN
AT THE OFFICES OF THE U.S. ATTORNEY, CAMDEN, NEW
JERSEY, COMMENCING AT 10:30 A.M.

1
2
3 A P P E A R A N C E S:
4

5 BLANK, ROME, COMISKY & MC CAULEY, ESQUIRES
6 BY: E. HUNTER TAYLOR, ESQUIRE
7 ATTORNEYS FOR THE PLAINTIFF, ZEE

8 BY: JAMES C. WOODS, ESQUIRE
9 ATTORNEY FOR THE UNITED STATES
10 ENVIRONMENTAL PROTECTION AGENCY

11 W. CARY EDWARDS, ATTORNEY GENERAL
12 BY: ANNE R. SIMONOFF,
13 DEPUTY ATTORNEY GENERAL
14 ATTORNEYS FOR THE DEPARTMENT OF
15 ENVIRONMENTAL PROTECTION

16 MC CARTER & ENGLISH, ESQUIRES
17 BY: FRANK E. FERRUGGIA, ESQUIRE
18 ATTORNEYS FOR OWENS-ILLINOIS

19 DECHERT, PRICE & RHOADS, ESQUIRES
20 BY: BRADFORD F. WHITMAN, ESQUIRE
21 AND
22 WENDY R. RELATION, ESQUIRE
23 ATTORNEYS FOR ROHM & HAAS

24 ELLEN S. FRIEDEL, ESQUIRE
25 IN-HOUSE COUNSEL FOR ROHM & HAAS

GOODWIN, PROCTER & HOAR, ESQUIRES
BY: FRANKLIN C. HUNTINGTON, IV
ATTORNEYS FOR CES, INC.

In The Matter Of:

In the Matter of: Boarhead Farms Superfund

Franklin Pertnoy
February 12, 1997

Krauss, Katz & Ackerman, Inc.
Legal Support Services
1880 John F. Kennedy Blvd.
15th Floor
Philadelphia, PA 19103
(215) 988-9191 FAX: (215) 988-1821

Original File fp021296.asc, 104 Pages
Min-U-Script® File ID: 3500807103

Word Index included with this Min-U-Script®

Page 1

[1]
[2] IN RE:
[3]
[4] BOARHEAD FARMS SUPERFUND SITE
[5]
[6]
[7]
[8] February 12, 1997
[9]
[10]
[11] Oral deposition of FRANKLIN
[12] PERTNOY, held in the offices of the
[13] United States Environmental Protection
[14] Agency, 841 Chestnut Street,
[15] Philadelphia, Pennsylvania 19107,
[16] commencing at 10:10 a.m., on the above
[17] date, before Patricia Nolan, a Court
[18] Reporter and a Commissioner of the
[19] Commonwealth of Pennsylvania.
[20]
[21]
[22] KRAUSS, KATZ & ACKERMAN, INC.
[23] Legal Support Services
[24] 1880 John F. Kennedy Boulevard
15th Floor
Philadelphia, Pennsylvania 19103
(215) 988-9191

Page 2

[1] APPEARANCES :
[2] UNITED STATES ENVIRONMENTAL
[3] PROTECTION AGENCY
[4] BY: SARA P. KEATING, ESQUIRE
841 Chestnut Street
Philadelphia, Pennsylvania 19107
Counsel for Boarhead Farms
[5]
[6]
[7] ALSO PRESENT:
[8] BEVIN HARDY
[9] PAUL NEAL
[10] JOAN E. MARTIN-BANKS
[11]
[12]
[13]
[14]
[15]
[16]
[17]
[18]
[19]
[20]
[21]
[22]
[23]
[24]

Page

[1]		
[2]	INDEX	
[3]	WITNESS	PAGE NO.
[4]	FRANKLIN KEATING	
[5]	By Ms. Keating	4
[6]		
[7]		
[8]	EXHIBITS	
[9]	NO. DESCRIPTION	PAGE NO.
[10]	1 Subpoena	7
[11]	2 Photograph of site	38
[12]	3 Photographs of site	38
[13]	4 Operating record	41
[14]	5 Operating record	53
[15]	6 Shipping order	57
[16]	7 Shipping order	59
[17]	8 Operating record	69
[18]	9 Operating record	76
[19]	10 Photographs of site	80
[20]	11 Operating record	81
[21]	12 Shipping order	81
[22]	13 Photograph of site	92
[23]		
[24]		

Page

[1]
[2] FRANKLIN PERTNOY, after
[3] having been duly sworn, was
[4] examined and testified as follows:
[5]
[6] EXAMINATION
[7]
[8] BY MS. KEATING:
[9] Q: Mr. Pertnoy, my name is Sara
[10] Keating. I have with me Joan
[11] Martin-Banks, who's a Civil Investigator
[12] with the EPA, Bevin Hardy, who's a
[13] paralegal and Paul Neal, who is also a
[14] paralegal, assisting me with the Boarhead
[15] Farms Superfund matter.
[16] I'm going to be asking you a
[17] number of questions relating to the
[18] Boarhead Farms Superfund sites, as well
[19] as your experience in the past with
[20] Marvin Jonas or Jonas Trucking. Joan
[21] Martin-Banks may be asking you some
[22] questions as well. And Bevin Hardy and
[23] Paul Neal will be assisting as well.
[24] The subpoena that you

In The Matter Of:

*Boarhead Farms Superfund Site
Bucks County, Pa*

*Jeffrey L. Shaak
June 25, 1997*

*Krauss, Katz & Ackerman, Inc.
Legal Support Services
1880 John F. Kennedy Blvd.
15th Floor
Philadelphia, PA
(215) 988-9191 FAX: (215) 988-1821*

*Original File js062597.v1, 115 Pages
Min-U-Script® File ID: 2813426886*

Word Index included with this Min-U-Script®

Page 1

(1) UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
(2) REGION III
(3) 841 Chestnut Street
(4) Philadelphia, Pennsylvania 19107
(5)
IN THE MATTER OF :
(6)
Boarhead Farms :
(7) Superfund Site : SUBPOENA AD
Bucks County, : TESTIFICANDUM
(8) Pennsylvania : Subpoena No. 000037
(9) COPYRIGHTED MATERIAL
(10)
(11) June 25, 1997
(12)
(13) Oral deposition of JEFFREY L.
(14) SHAAK, held at the Best Western, Route
(15) 309 and Stump Road, Montgomeryville,
(16) Pennsylvania commencing at 10:00 a.m., on
(17) the above date, before Linda Rossi Rios,
(18) a Federally Approved Registered
(19) Professional Reporter and Notary Public
(20) of the Commonwealth of Pennsylvania.
(21)
KRAUSS, KATZ & ACKERMAN, INC.
(22) Legal Support Services
15th Floor
(23) 1880 John F. Kennedy Boulevard
Philadelphia, Pennsylvania 19103
(24) (215) 988-9191

Page 2

(1) APPEARANCES :
(2) ENVIRONMENTAL PROTECTION AGENCY
BY: SARAH KEATING, ESQUIRE (3RC33)
(3) 841 Chestnut Street
Philadelphia, Pennsylvania 19107
(4) Counsel for the EPA
(5) ALSO PRESENT:
(6) PAUL NEALE
BEVIN ESPOSITO
(7) JOAN MARTIN-BANKS
(8)
(9)
(10)
(11)
(12)
(13)
(14)
(15)
(16)
(17)
(18)
(19)
(20)
(21)
(22)
(23)
(24)

Page 3

(1)
(2) INDEX
(3) WITNESS PAGE NO.
(4) JEFFREY L. SHAAK
(5) By Ms. Keating 4
(6)
(7) EXHIBITS
(8) NO. DESCRIPTION PAGE NO.
(9) Exhibit 1 Subpoena 9
(10) Exhibit 2 Map 13
(11) Exhibit 3 Picture 14
(12) Exhibit 4 Invoices-Ciba
(13) Geigy 50
(14) Exhibit 5 Pictures 62
(15) Exhibit 6 National Rolling
(16) Mills Document 66
(17) Exhibit 7 Bills of Lading 69
(18) Exhibit 8 Philco-Ford
(19) Invoices 77
(20) Exhibit 9 Pictures 78
(21) Exhibit 10 Invoices-Advanced
(22) Environmental 81
(23) Exhibit 11 Invoice-Advanced
(24) Environmental 82

Page 4

(1) EXHIBITS
(2) NO. DESCRIPTION PAGE NO.
(3) Exhibit 12 Purchase Order-Diaz 83
(4) Exhibit 13 Bill of Lading 86
(5) Exhibit 14 American Cyanamid
(6) Listing 88
(7) Exhibit 15 American Cyanamid
(8) documents 90
(9) Exhibit 16 May 17, 1976 letter 92
(10) Exhibit 17 SPS Purchase order 93
(11) Exhibit 18 SPS Purchase Order 94
(12) Exhibit 19 SPS Purchase Order 94
(13)
(14)
(15)
(16)
(17)
(18)
(19)
(20)
(21)
(22)
(23)
(24)